

# EXHIBIT 1

**Lindsay, Jonathan**

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**From:** Lindsay, Jonathan  
**Sent:** Wednesday, November 22, 2023 6:43 AM  
**To:** 'Trials'  
**Cc:** 'winston-ipr-netlist@winston.com'; #NetlistIPR [Int]; 'Williams, Eliot D.'; 'DL Samsung Netlist IPRs'  
**Subject:** IPR2022-00615 (912) - Request for Conference Call

Dear Honorable Board,

Patent Owner requests a conference call with the Board to seek leave to move to admit testimony given by Micron's designated corporate representative in district court proceedings on the '912 patent that is highly material to, and inconsistent with, positions taken by the Petitioners before the PTAB. The corporate representative Scott Cyr has designed memory modules at Micron for over 24 years, and has been responsible for modules from DDR1 through the present. This deposition did not occur until November 20. The next day Netlist asked for Micron to confirm the testimony was not confidential, or in the alternative to agree that it can be presented to the PTAB via the default protective order. The testimony relates to the following issues:

- (a) The meaning of the term "double-data-rate (DDR) memory devices." Micron's corporate representative testified that DDR is a type of memory device defined by JEDEC and is distinct from other DRAM devices.
- (b) The meaning of the term "rank." Micron's corporate representative testified that a rank requires more than on DDR memory device.

Patent Owner also intends to update the Board regarding the district court's claim construction during the conference call and/or when filing its sur-reply.

Yesterday morning, Patent Owner requested Petitioner's position and availability for a call with the Board, but has not heard back as of the sending of this email.

Due to the importance of this matter, Patent Owner can be available at any time.

Jonathan M. Lindsay  
IRELL & MANELLA LLP  
840 Newport Center Drive, Suite 400  
Newport Beach, CA 92660  
Direct: 949.760.5220